

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) CASE NO. CASE NO. CR 18-577 CRB  
Plaintiff, )  
v. ) STIPULATION REGARDING BUSINESS  
MICHAEL RICHARD LYNCH and ) RECORDS OF HSBC  
STEPHEN KEITH CHAMBERLAIN, )  
Defendants. )

The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).

Exhibit	Description	Custodian
11999	Premier Bank statement for acct# ending 1627, Sushovan Hussain	HSBC
12000	Premier Bank statement for acct# ending 1627, Sushovan Hussain	HSBC

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2	12002 Copy of checks, Premier Bank, Sushovan Hussain	HSBC

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6  
7 DATED: March 14, 2024

8  
9 Respectfully submitted,

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12 PATRICK D. ROBBINS  
13 Attorney for the United States,  
14 Acting Under Authority Conferred by  
15 28 U.S.C. § 515

16  
17 /s/

18  
19  
20 ROBERT S. LEACH  
21 ADAM A. REEVES  
22 KRISTINA N. GREEN  
23 ZACHARY G.F. ABRAHAMSON  
24 Assistant United States Attorneys

25  
26 DATED: March 14, 2024

27 CLIFFORD CHANCE US LLP

28 /s/

29  
30 CHRISTOPHER J. MORVILLO  
31 Attorneys for Defendant Michael Lynch

32  
33 DATED: March 14, 2024

34 BIRD, MARELLA, BOXER, WOLPERT,  
35 NESSIM, DROOKS, LINCENBERG, &  
36 RHOW, P.C.

37 /s/

38  
39 GARY S. LINCENBERG  
40 Attorneys for Defendant Stephen  
41 Chamberlain